

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

YANPING WANG,

Defendant.

Case No. 23-CR-118-AT

**NOTICE OF MOTION FOR AN  
ORDER REVOKING THE MAGISTRATE  
JUDGE'S ORDER OF DETENTION  
AND AUTHORIZING PRETRIAL  
RELEASE**

**PLEASE TAKE NOTICE** that, pursuant to 18 U.S.C. § 3142, upon the accompanying Declaration of Alex Lipman and the exhibits attached thereto, the Declaration of Robert Glenn and the exhibits attached thereto, and Memorandum of Law, Defendant Yanping Wang, by and through her counsel Lipman Law PLLC and ChaudhryLaw PLLC, respectfully moves this Court before the Honorable Analisa Torres, United States District Judge, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order revoking the Magistrate Judge's April 21, 2023, Order of Detention and Authorizing Pretrial Release.

Dated: New York, New York  
June 5, 2023

Lipman Law PLLC

By: /s/ Alex Lipman

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